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June 15, 2020

BY ECF

Hon. Mary Kay Vyskocil
Southern District of New York
Daniel Patrick Moynihan Courthouse, Courtroom 18C
500 Pearl Street
New York, NY 10007

Re: Diangelo Enriquez v. City of New York, et al., 17-CV-4293 (VSB)

Your Honor:

I am Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced matter.

I am writing to submit this joint application on behalf of all parties for an adjournment of the status conference scheduled for June 24, 2020 the deadline for the parties' status report of June 17, 2020. The parties respectfully request that those dates be adjourned by approximately four weeks, to dates convenient for the Court.

The adjournment is requested because the practical and legal restrictions arising from the COVID-19 emergency have only very recently begun to abate, and the pace of continued relaxation of those constraints is uncertain. As of now, the New York State Executive Order limiting in-person civil litigation activities has not been lifted and all counsel in the matter continue to work exclusively by remote means. In addition, the Office of the Chief Medical Examiner has been overburdened with COVID-19 related work, which burdens have only now begun to abate. As a result, although the parties have been in contact during this period, they have not been able to make substantial progress on resolving discovery disputes or towards settlement.

The parties, however, expect both to occur within the next three to four weeks. They also expect that an in person conference, if that is contemplated by the Court, will be feasible after

that time period. Accordingly, the parties respectfully request an adjournment of the report and conference dates by approximately four weeks to dates convenient for the Court.

This status conference date has been adjourned previously: once at the joint request of the parties due to the COVID-19 emergency and twice *sua sponte* by the Court.

We thank the Court for its consideration of this matter.

Respectfully submitted,

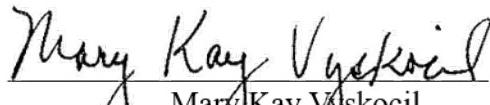
Alan H. Scheiner /s/

Alan H. Scheiner
Senior Counsel

cc: All Counsel (by ECF)

GRANTED. The conference scheduled for June 24, 2020 is adjourned to July 22, 2020 at 11:30AM. Unless otherwise ordered by the Court, the conference will be held telephonically. To participate, dial 888-278-0296 and enter access code 5195844. The Parties' deadline for submitting a joint status letter is extended to July 15, 2020. The Parties are advised that the deadline for fact discovery remains November 1, 2020, and that all discovery must be completed by December 24, 2020. The Court is unlikely to extend either deadline. The Parties are highly encouraged to conduct as much discovery as possible remotely and to confer as needed to resolve discovery disputes. Such consultation does not require in person communications. SO ORDERED.

Date: 6/17/2020
New York, New York


Mary Kay Vyskocil
United States District Judge